

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINTS

Special Agent Brian M. Jones, having been duly sworn, hereby deposes and states as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, and have served in that capacity since July 2002. I served on the drug and violent crime squad from November 2003 until June 2009. In June 2009, I was assigned on an 18-month Temporary Duty Assignment (TDY) as a Supervisory Special Agent in the Gang/Criminal Enterprise Section, Safe Streets and Gang Unit, located at FBI Headquarters in Washington, D.C. In December 2010, my TDY in Washington, D.C. ended and I returned to Columbia, South Carolina (SC) to serve on the drug and violent crime squad.
2. As a case agent, I have prepared and sworn to Title III affidavits and participated in the preparation of several other Title III affidavits for the FBI that were utilized in major narcotics and gang investigations. Additionally, I have participated in numerous narcotics investigations, during the course of which I have conducted or participated in physical and electronic surveillance, written and executed search warrants, debriefed informants and reviewed taped conversations and narcotics records. Through my training, education, and experience, I have become familiar generally with the manner in which illegal drugs are imported and distributed, the method of payment for such drugs, and the efforts of persons involved in such activity to avoid detection by law enforcement. Additionally, I have received training, both formal and informal, in the operation of drug trafficking, money laundering, and wiretap investigations. In 2004, the FBI formed the Columbia Violent Gang Task Force (CVGTF). The CVGTF is an FBI led joint task force consisting of the FBI, South Carolina State Law Enforcement Division (SLED), Richland County Sheriff's Department (RCSD), and the Columbia Police Department (CPD). I am the task force coordinator and one of the lead case agents for the task force investigations, which typically pertain to violations of Title 18 and Title 21 of the United States Code.
3. I am submitting this Affidavit in support of the belief that there is probable cause to issue arrest warrants for the following individuals: Eric Dean Smith, a/k/a "Big E," a/k/a "Big Boy," (hereinafter SMITH); FNU LNU, a/k/a "BIRD" (hereinafter BIRD¹); Amos Donnell Jones, a/k/a "Famous Amos" (hereinafter JONES); Stephoni Vernard Sumter, a/k/a "Steezy" a/k/a "Step" (hereinafter SUMTER); Tony L. Gunter (hereinafter GUNTER); [REDACTED]; Dion W. Jones, a/k/a "Juvy" (hereinafter DION); and FNU LNU, a/k/a "JIT" (hereinafter JIT).
4. The following paragraphs are furnished to establish probable cause in support of the arrest warrants. I am familiar with this investigation through personal knowledge and

¹ On September 18, 2014, an intercepted call revealed that BIRD's nine year old son had been caught at school with a BB gun and that BIRD had to pick his son up from school. According to Richland County Sheriff's Department School Resource Officer Chet Peterson, a child brought a BB gun to school at Conder Elementary School on September 18, 2014. Officer Peterson further advised that Demetrius Rashon Gallman picked the child up from school. Agents have not yet conclusively determined if Gallman is in fact BIRD.

through other law enforcement officers. I have good reason to believe and do believe that all of the information provided to me and contained herein is credible and true. I have asserted "belief statements" throughout this affidavit. These belief statements are based on my training and experience in conducting complex investigations of criminal enterprises to include violent street gangs and high-level drug traffickers.

5. The FBI conducted extensive surveillance operations in conjunction with the wiretaps in this investigation. A combination of surveillance and intercepted calls revealed that this organization uses the following locations, some of which the FBI may apply for search warrants, in furtherance of their illegal drug trafficking activities:
 - a. 455 Meadowfield Road, Gaston, SC (hereinafter referred to as SMITH'S RESIDENCE), which I believe is the current residence of SMITH and his wife, Khalilah Shunta Smith.
 - b. 105 Thornwell Court, Apartment D, Columbia, SC (hereinafter referred to as JONES' RESIDENCE), which I believe is the current residence of JONES and Taketa Sharon Rhodes.
 - c. 105 Thornwell Court, Apartment B, Columbia, SC (hereinafter referred to as GUNTER'S RESIDENCE), which I believe is the current residence of GUNTER and Stephanie Melissa Garrison.

BACKGROUND INFORMATION

6. During 2013, the FBI CVGTF began investigating the criminal activities of Blood gang members and their illegal drug suppliers. As part of the investigation, the FBI conducted a series of Title III wiretaps authorized by the Honorable Margaret B. Seymour, Senior United States District Judge for the District of South Carolina (hereinafter "Judge Seymour.") These Title III wiretaps began in June 2014.
7. On June 23, 2014, Judge Seymour signed a Court Order authorizing the original interception of wire and electronic communications over telephone number (803) 743-2568, used by JONES (hereinafter *Target Phone 2*). On July 23, 2014, Judge Seymour signed a Court Order authorizing the continued interception wire and electronic communications over *Target Phone 2*; and authorizing the original interception of wire and electronic communications over telephone number (803) 363-6006, used by JONES (hereinafter *Target Phone 3*). Interceptions over *Target Phone 2* commenced on June 24, 2014, and were terminated just after midnight on August 21, 2014. Interceptions over *Target Phone 3* commenced on July 24, 2014, and were terminated just after midnight on August 21, 2014.
8. Intercepts over *Target Phone 2* and *Target Phone 3* have established that JONES is a cocaine and crack cocaine dealer who operates in the Lyon Street Community in Columbia. Agents have learned that JONES mainly utilizes *Target Phone 2* to talk to close associates and customers. JONES uses *Target Phone 3* to communicate with his

cocaine supplier, BIRD, who is selling cocaine for SMITH. Intercepted calls have revealed that JONES routinely pools his money with other co-conspirators to purchase larger quantities of cocaine at a time. As detailed herein, intercepted calls have revealed that JONES has supplied SUMTER, a known Blood gang member with a reputation for robbing other drug dealers, with multi-ounce quantities of cocaine. Intercepted calls have further revealed that DION purchases multi-ounce quantities of cocaine from JONES on a regular basis. DION and JONES often pool their money when JONES is going to meet with BIRD. Intercepted calls have also revealed that JONES supplies JIT with quarter to ounce quantities of cocaine and/or crack cocaine.

9. On August 12, 2014, Judge Seymour signed a Court Order authorizing the original interception of wire and electronic communications over telephone number (803) 997-1307, used by SUMTER (hereinafter *Target Phone 4*); and the original interception of wire and electronic communications over telephone number (803) 587-9114, used by BIRD (hereinafter *Target Phone 5*).
10. Intercepts over *Target Phone 5* have established that BIRD works for SMITH in the cocaine business. It is clear that BIRD only uses *Target Phone 5* to contact his cocaine customers. Intercepted calls have revealed that BIRD, at the direction of SMITH, shuts his phone off when he does not have any cocaine to sell. Agents have not intercepted any calls over *Target Phone 5* between BIRD and SMITH; however, BIRD has given SMITH's number, (later identified as *Target Phone 6*), to some of his customers. I believe based on intercepts over *Target Phone 5* that BIRD supplies over 30 customers with cocaine at the direction of SMITH. Intercepts have revealed that BIRD delivers the cocaine pre-packaged to his customers in quantities ranging from 7 grams to six ounces at a time. Intercepts have revealed that GUNTER purchases cocaine from BIRD after taking orders from his customers. GUNTER has ordered up to six ounces of cocaine at a time from BIRD. Intercepts have also revealed that BIRD also supplies [REDACTED] with cocaine.
11. On September 10, 2014, Judge Seymour authorized the continued interception of wire and electronic communications over *Target Phone 4* and *Target Phone 5*; the original interception of wire and electronic communications over telephone number (803) 960-0084, used by SMITH (hereinafter *Target Phone 6*); and the original interception of wire and electronic communications over telephone number (803) 261-7643, used by SUMTER (hereinafter *Target Phone 7*). Interceptions over *Target Phone 4* and *Target Phone 5* began on August 13, 2014, and are set to expire on October 9, 2014. Interceptions over *Target Phone 6* and *Target Phone 7* began on September 10, 2014, and are set to expire on October 9, 2014.
12. Intercepts over *Target Phone 4* and *Target Phone 7* have established that SUMTER is a crack cocaine dealer who mainly operates in the Gonzales Gardens public housing complex in Columbia. Intercepted calls have also established that SUMTER and JIT are close associates and SUMTER has supplied JIT with cocaine and/or crack cocaine. As detailed herein, SUMTER has discussed how he attempted to commit a robbery of another drug dealer and claimed to have been in a shootout with the person. Intercepts have revealed that SUMTER obtains his cocaine from various sources of supply.

13. Intercepts over *Target Phone 6* have established that SMITH is supplying BIRD and several other individuals with cocaine. Agents identified telephone number (803) 200-5909 as the number that BIRD uses to talk to SMITH on *Target Phone 6*. SMITH has also used *Target Phone 6* to talk to some of the customers that BIRD is supplying with cocaine; however, SMITH does not typically discuss prices or quantities with most of these individuals. Intercepted calls have revealed that SMITH relies on BIRD to conduct the transactions with the customers and then bring the money to SMITH before SMITH meets with his cocaine supplier. Intercepts over *Target Phone 6* have also revealed that SMITH is heavily involved in breeding dogs for the purpose of dog fighting. Intercepts and physical surveillance have revealed that SMITH stores cocaine and over 30 dogs at SMITH'S RESIDENCE.
14. As further detailed herein, in addition to distributing cocaine and crack cocaine, intercepted calls have revealed that members of this conspiracy possesses and uses firearms in violation of Title 18, United States Code, Section 924(c) to further their drug trafficking activities

WIRETAP EVIDENCE AND SURVEILLANCE

15. On June 25, 2014, at 2:29 p.m., JONES used *Target Phone 2* to call DION at (803) 550-0158. During the intercepted call, DION said, "Can I get me two?" JONES said, "... yeah you can get 27 ... and if you want them I'm let you get these two ... that I got." DION said, "I ain't got nothing but 26 man." JONES said, "I can't make no money like that cuz – just buy one then." (I believe DION wanted to buy two ounces of cocaine from JONES, who wanted \$2,700; however, DION only had \$2,600 so JONES suggested DION just purchase one ounce.) JONES wanted to know what DION was going to do because JONES was getting ready to go to the doctor. DION said, "I want them – I just ... will it kill you to call your peoples and get me three ..." JONES said, "The man – listen ... I ain't even talk to the man – I mean I ain't got to – he probably ain't coming out until this evening – now if you want to wait ..." DION said, "Man I really need three man but my money ain't all the way right for that ..." (I believe DION wanted JONES to contact his supplier and order him three ounces of cocaine; however, JONES was advising that his supplier was not coming out until later in the evening.) JONES again asked what DION wanted to do. DION said, "I'll get one of them." They discussed where they were going to meet. JONES confirmed he wanted it and DION said, "Yeah I want the shit – but I ain't want that shit shake and all that shit – I need all rock for 13-5." JONES said he would get it and show it to him. (I believe DION ultimately decided he wanted to purchase one ounce of cocaine for \$1,350 but wanted to see it first to check the quality.)
16. On June 28, 2014, at 8:17 p.m., *Target Phone 2* received an SMS text message from (803) 206-3184, a phone used by JIT, that read, "21 put my split separate." (I believe that JIT wanted to purchase a total of 21 grams of cocaine but he wanted his 14 grams packaged separately.)

17. On July 1, 2014, at 8:59 p.m., Mike Huggins used (803) 445-0664 to call JONES on *Target Phone 2*. JONES told Huggins he had just gotten up. Huggins told JONES he wanted to get something for “\$2.” JONES instructed Huggins to meet him at the Hardee’s on Rosewood. (I believe JONES had just gotten out of bed and was likely at JONES’ RESIDENCE when this call took place due the fact it is located directly behind the Hardee’s Restaurant on Rosewood Drive. Other intercepted calls have revealed that JONES routinely met customers and his supplier, BIRD, at the Hardee’s on Rosewood Drive.)
18. On July 2, 2014, at 11:29 a.m., JONES used *Target Phone 2* to call JIT at (803) 206-3184. During the intercepted call, JIT asked, “What’s up...where you at?” JONES said, “I am on the hill, what’s happening?” JIT said, “Shit - I need a zip – I’m trying to come holler at you.” JONES said, “I ain’t got no zip - I got like three left - my brother fixing to get one - and I have Juve (DION) getting one - you might get a half.” JIT said, “I’m about to come another one now.” JONES however had already hung up. (I believe that JIT wanted to purchase a “zip,” or ounce, of cocaine; however JONES told him he only had three ounces left and that all but a half of an ounce was already spoken for by other buyers. JONES however told JIT that he could come and get a half of an ounce.)
19. On July 2, 2014, at 3:47 p.m., Alexander Faust (hereinafter Faust) used (803) 363-7517 to call JONES on *Target Phone 2*. During the intercepted call Faust and JONES discussed different law enforcement vehicles they had seen in the area. JONES then said, “Well listen – anyway – check this out ... I put that pistol up under the thing.” Faust said, “The what?” JONES said, “Superman.” Faust said, “You put it where?” JONES said, “Up under the pillow.” (I believe JONES uses Faust’s residence to store a firearm.)
20. On July 3, 2014, at 3:42 p.m., DION used (803) 550-0158 to call JONES on *Target Phone 2*. During the intercepted call, DION said, “You don’t know what time?” JONES said, “Hell no – man I text him – shit I’m waiting.” DION said, “Shit I might make that two for me man.” JONES said, “... that’s cool – but ... in the meantime ... until he call me I got six of them man – ‘cause I want to get some too.” DION said, “So what, you got it?” JONES said, “No – huh uh – hell no – I told you what I had – I’m just waiting. He should be hitting me.” DION asked if JONES wanted him to “bring the change” or just wait for JONES to call him back. JONES said, “Just wait ‘cause I don’t want all that god damn money man.” (I believe that DION wanted to purchase two ounces of cocaine from JONES but JONES was waiting for BIRD to call him back.)
21. On July 7, 2014, at 4:46 p.m., JONES used *Target Phone 2* to call JIT at (803) 206-3184. During the intercepted call, JONES and JIT talk about JONES’ cocaine supplier who was in the hospital. JIT then said, “I had found a thing for you - it’s god damn it’s small though a god damn ... a four five.” JONES said, “For how much?” JIT said, “Shit you know god damn ... you know me and you we can work something out - I ain’t going to god damn ... probably like 150.” JONES said, “Alright”. (I believe that JIT was trying to sell JONES a .45 caliber handgun for \$150.)

22. On July 8, 2014, at 11:53 a.m., Faust used (803) 363-7517 to call JONES on *Target Phone 2*. JONES answered and said, "Bring my gun out the door." Faust said, "Alright." Faust went on to say he had just packed it up. JONES told him to come out the door "right now." (I believe Faust was holding JONES' gun at his residence and JONES wanted him to bring the gun to him immediately.)
23. On July 8, 2014, at 12:36 p.m., DION used telephone number (803) 550-0158 to call JONES on *Target Phone 2*. During the intercepted call, DION asked, "You want me to call that boy who I tell you got these things?" (Based on other calls, I believe DION was attempting to locate a firearm for JONES to purchase.) JONES said, "Yeah, I need one right now on the hill." JONES went on to say he had been trying to call "Step" (SUMTER) but he would not answer his phone. DION said "Man, dog ... I can't say he ain't had nothing to do with that shit cuz but ... god damn together man - them Bloods and all that shit - I ain't know ... then how the hell ... that's crazy - this man come roll up on you with a strap out?" (Other intercepted calls revealed that a man attempted to rob JONES at gunpoint while JONES was with Faust. I believe JONES was looking for another firearm to purchase and he had tried to call SUMTER; however, SUMTER would not answer his phone. I believe DION was telling JONES that he suspected that SUMTER may have had something to do with the attempted robbery of JONES. Additional intercepted calls revealed that DION did in fact locate two guns but JONES declined to purchase them.)
24. On July 8, 2014, at 5:31 p.m., *Target Phone 2* received an SMS text message from (803) 206-3184, a phone used by JIT, that read, "Everyhang everything." (I believe JIT was asking JONES if he had cocaine to sell.)
25. On July 8, 2014, at 5:41 p.m., *Target Phone 2* sent an SMS text message to (803) 206-3184, a phone used by JIT, that read, "halfway." (I believe JONES was responding to JIT saying he had a half ounce he could sell him.)
26. On July 8, 2014, at 6:47 p.m., JIT used (803) 206-3184 to call JONES on *Target Phone 2*. During the intercepted call, JONES told JIT, "Big Bab over here, I got your half though." JIT said, "Alright." (I believe that JONES agreed to sell JIT a half ounce of cocaine, however, JONES wanted JIT to know that CPD narcotics officer Babin was in the area.)
27. On July 8, 2014, at 11:21 p.m., JONES used *Target Phone 2* to call his girlfriend, Taketa Sharon Rhodes (hereinafter Rhodes) at (803) 629-7702. When Rhodes answered, JONES said, "Look out the window – what you see?" After a short pause, Rhodes said, "Nothing." JONES said, "Alright – I'm getting ready to leave." (I believe JONES was calling Rhodes to have her check outside for unusual vehicles. I believe JONES was getting ready to go home to JONES' RESIDENCE and wanted to make sure no one out of the ordinary was parked outside. I believe JONES was checking to ensure no one was there to rob him since someone attempted to rob him earlier in the day.)
28. On July 13, 2014, at 6:47 p.m. JONES used *Target Phone 2* to call JIT at (803) 206-3184. During the intercepted call, JIT asked JONES, "What's going on bro?" JONES said,

“Waiting.” JIT said, “Alright - you going to pull up on me?” JONES said, “I said I’m waiting … yeah I’ll call you and let you know something.” JIT said, “Alright.” (I believe JIT was trying to get resupplied with cocaine. I believe JONES was telling JIT that he was waiting on BIRD and that he would call JIT when he had something.)

29. On July 14, 2014, at 8:57 p.m., JONES used *Target Phone 2* to call Rhodes at (803) 629-7702. JONES said, “Will you do me a favor baby?” Rhodes asked, “What’s that?” JONES said, “Look in that … cabinet … in the kitchen – the bottom part – right? You hear me?” Rhodes said, “I’m listening.” JONES said, “Oh – hand me that bag – I’m fixing to pull up – in about five minutes.” Rhodes asked which cabinet and JONES specified it was in the far end. After a short pause she asked if it was by the washing machine and JONES confirmed that was correct. (I believe JONES was asking Rhodes to retrieve a bag of either money or drugs that he had hidden at JONES’ RESIDENCE.)
30. On July 19, 2014, at 10:53 a.m., *Target Phone 2* received an SMS text message from (803) 550-0158, a phone used by DION, that read, “Do u got a zip.” (I believe DION was asking JONES if he had an ounce of cocaine to sell him.)
31. On July 19, 2014, at 8:16 p.m., JONES used *Target Phone 2* to call DION at (803) 550-0158. During the intercepted call DION said, “Shit – trying to do like one time.” JONES said, “Well shit come on then – come to Bub’s house right now then.” (I believe DION wanted to purchase one ounce of cocaine from JONES.)
32. On July 29, 2014, at 2:26 p.m., JONES used *Target Phone 3* to call BIRD on *Target Phone 5*. During the intercepted call BIRD told JONES he was on the road coming back to Columbia. JONES said, “I’m going to need – uh – six – what – five of them.” BIRD confirmed JONES wanted five and said he would hit JONES back in a little while because he was on the road. (I believe BIRD was en route to Columbia with the cocaine and JONES wanted to purchase five ounces of cocaine from BIRD. Subsequent intercepted calls between *Target Phone 3* and *Target Phone 5* established that BIRD and JONES met around 4:20 p.m. that day.)
33. On July 29, 2014, at 4:42 p.m., JONES used *Target Phone 3* to call Faust at (803) 363-7517. Faust answered and JONES asked what was up. Faust said, “Ain’t nothing – sitting here chilling with cuz.” JONES said, “Who, Juve?” Faust said, “Yeah he trying to take care of some business and stuff – he on the other phone … he on the phone trying to take care of business.” JONES said, “Oh – well put my … put my stuff up there – get my stuff ready – I’m fixing to pull up – put it in the kitchen.” Faust said, “Do what now?” JONES said, “I say put my – put my stuff together on top of … I’m fixing to pull up.” Faust agreed. (I believe Faust was telling JONES that DION, who he identified as “Juv,” was at Faust’s residence on the phone. I believe JONES had just obtained five ounces of cocaine from BIRD and was keeping his crack cooking tools at Faust’s residence. I believe JONES wanted Faust to retrieve the crack cooking kit and get it ready for JONES to pick up.)
34. On July 29, 2014, at 5:01 p.m., SUMTER used *Target Phone 4* to call JONES on *Target Phone 2*. JONES answered and SUMTER said, “Where you at?” JONES said, “Who

this is?" SUMTER said, "This Steezy man." JONES said, "What up?" SUMTER said, "Shit – just run into Juve's ass." SUMTER then asked, "Where the hell you at though - I'm trying to fuck with you." JONES said, "Shit – trying to put something together right fast." SUMTER said, "Man make sure you call me man." (I believe that SUMTER ran into DION, who told SUMTER that JONES had cocaine. I believe SUMTER wanted to purchase some cocaine from JONES and wanted to know where JONES was. I believe JONES was cooking the cocaine into crack when he said he was trying to "put something together" and SUMTER wanted JONES to make sure he called when he was done. Additional calls between JONES and SUMTER confirmed they met up later that evening.)

35. On July 30, 2014, Taketa Rhodes used (803) 629-7702 to call JONES on *Target Phone 3*. During the intercepted call, JONES told Rhodes he was "at the house" and was "debating what he was going to eat." (According to cell tower data,² *Target Phone 3* was in the vicinity of JONES' RESIDENCE during this call. I believe JONES was telling his girlfriend, Rhodes, that he was at the home they share and was debating what he was going to eat.)
36. On July 30, 2014, at 2:11 p.m., JONES used *Target Phone 2* to call SUMTER on *Target Phone 4*. SUMTER answered, "Yo." JONES said, "I'm going to hit you when he calls me." SUMTER said, "Hello." JONES said, "Yo." SUMTER said, "Yep." SUMTER then complained that JONES called him "blocked," meaning from a blocked number. Then they both said, "Alright" and the call ended. (I believe JONES was letting SUMTER know he would call back when JONES heard back from BIRD. Intercepted calls revealed that JONES met with BIRD around 4:54 p.m. to purchase cocaine.)
37. On July 30, 2014, at 5:01 p.m., *Target Phone 4* sent an SMS text message to *Target Phone 2* that read, "Yo." (I believe SUMTER knew JONES was meeting BIRD and wanted to get the cocaine he ordered through JONES.)
38. On July 30, 2014, at 5:03 p.m., *Target Phone 2* sent an SMS text message to *Target Phone 4* that read, "2 -2650." (I believe JONES was telling SUMTER he would sell him two ounces of cocaine for \$2,650.)
39. On July 30, 2014, at 5:04 p.m., *Target Phone 4* sent an SMS text message to *Target Phone 2* that read, "Alright." (I believe SUMTER was agreeing to JONES' price for the two ounces.)
40. On July 30, 2014, at 5:06 p.m., *Target Phone 4* sent an SMS text message to *Target Phone 2* that read, "Where you and i want 3." (I believe SUMTER wanted three ounces instead of two ounces.)

² Throughout this affidavit I have referred to cell tower locations pertaining to some of the Target Phones. These locations are not based on GPS coordinates provided by the phone company; rather, they are based on the location of the cell tower the phone is using for service. In addition to the particular cell tower, the phone company provides information regarding the "face" or side of the cell tower on which the phone is located. I have used this information to verify when the Target Phones identified herein are in a particular area to further substantiate the location of the users of the Target Phones.

41. On July 30, 2014, at 5:23 p.m., *Target Phone 2* sent an SMS text message to *Target Phone 4* that read, "Got 2." (I believe JONES was telling SUMTER he would only sell him two ounces. Additional intercepted calls show JONES and SUMTER met after 6:00 p.m. that day.)
42. On August 1, 2014, at 6:02 p.m., JONES used *Target Phone 3* to call BIRD on *Target Phone 5*. BIRD said, "Hey Fame – I'm down here – just got back down here with him again and I'll hit you – um – I got yours and I'll hit you as soon as I get back up that way." JONES agreed. (I believe, based on a pattern of intercepted calls over *Target Phone 5*, that BIRD was meeting with SMITH, likely at SMITH'S RESIDENCE. I base this belief on the fact that surveillance and cell tower information collected on other occasions shows that BIRD routinely travels to Gaston, which south of Columbia ("down here"), to pick up cocaine from SMITH. A call between JONES and BIRD at around 7:15 p.m. that day revealed they were about to meet.)
43. On August 1, 2014, at 7:39 p.m., JONES used *Target Phone 2* to call Faust at (803) 363-7517. Faust answered and JONES said, "Hey ... put the stuff together and ... come to the back door." (I believe JONES had just purchased cocaine from BIRD and was telling Faust to get the crack cooking tools ready and to bring them to the back door at Faust's residence.)
44. On August 18, 2014, at 2:00 p.m., GUNTER used (803) 363-1847 to call BIRD on *Target Phone 5*. BIRD answered and said, "Hey – I'm just waiting on him to hit me." GUNTER said, "Yeah – I already got the money for four of them." BIRD did not hear GUNTER. GUNTER said, "I already got the money for four of them." BIRD said, "Okay – whenever he hit me ... he talked with me when I was at the barber shop but he said he was running somewhere – and he would be back – as soon as he got back home he would hit me." GUNTER said, "Alright – just letting you know that's what I got so far." (I believe BIRD was telling GUNTER he was waiting to hear back from SMITH so he could pick up the cocaine. I believe GUNTER was telling BIRD he had enough money from his customers to purchase four ounces of cocaine. I believe BIRD was telling GUNTER that he had talked to SMITH at the barber shop and that SMITH was going to call BIRD when he arrived at SMITH'S RESIDENCE so BIRD could pick up the cocaine.)
45. On August 18, 2014, at 3:45 p.m., GUNTER used (803) 363-1847 to call BIRD on *Target Phone 5*. BIRD answered and GUNTER said, "Hey – I'm going to need two more too." BIRD said, "So you going to need what – six?" GUNTER said, "Yeah." BIRD said, "Alright ... I'm just about – almost down there to him now." GUNTER said, "Huh?" BIRD said, "I say I'm almost down to him now ... I will call you when I'm coming up the road." (I believe GUNTER was telling BIRD he wanted to purchase a total of six ounces of cocaine. I believe BIRD was telling GUNTER he was almost to SMITH'S RESIDENCE to pick up the cocaine. At the time of this call, cell tower data showed *Target Phone 5* was in the Gaston, SC area, north of SMITH'S RESIDENCE. Cell tower data from *Target Phone 5* captured from intercepted calls between 3:58 p.m. and 4:30 p.m. revealed that *Target Phone 5* was hitting off two cell towers in the Gaston,

SC area. SMITH'S RESIDENCE is located between these two cell towers and, based on the intercepted calls combined with the cell tower data, I believe *Target Phone 5* was located at SMITH'S RESIDENCE during this time.)

46. On August 18, 2014, at 4:55 p.m., GUNTER used (803) 363-1847 to call BIRD on *Target Phone 5*. During the intercepted call, BIRD told GUNTER he was coming through Cayce. They agreed to meet at the B.P. gas station in Cayce. At 5:08 p.m., GUNTER called BIRD back and they changed the meeting location to McDonald's. At approximately 5:17 p.m., TFO Emmanuel DeJesus went to the McDonald's located on Huger Street and observed a black male standing behind a dark green Chevy Impala in the parking lot. TFO DeJesus then observed a grey Toyota Corolla, known to be driven by BIRD, pull into the parking lot of the McDonald's. The Toyota Corolla is a rental vehicle owned by Godwin Towing and Rentals. (As further detailed below, I believe the black male standing by the dark green Chevy Impala was GUNTER, who was meeting with BIRD to purchase six ounces of cocaine.)
47. On August 18, 2014, at 7:16 p.m., GUNTER used (803) 363-1847 to call BIRD on *Target Phone 5*. BIRD answered and said, "Hey what up bruh?" GUNTER said, "Hey – you ready?" BIRD said, "Yeah – matter of fact – I'm coming past the fair grounds – where you at?" GUNTER said, "Shit I'm on Rosewood." BIRD said, "Rosewood?" GUNTER said, "Yep – right behind the Hardee's." BIRD said, "Huh?" GUNTER said, "I'm right behind the Hardee's on Rosewood." BIRD said, "You say right behind Hardee's?" GUNTER said, "Yeah on Rosewood." BIRD agreed to come to GUNTER. (I believe GUNTER was calling BIRD to pay for some of the cocaine he purchased earlier and as detailed later, to purchase additional cocaine. I believe GUNTER was giving BIRD directions to GUNTER'S RESIDENCE, which is located in an apartment complex directly behind the Hardee's Restaurant on Rosewood Drive.)
48. On August 18, 2014, at 7:21 p.m., GUNTER used (803) 363-1847 to call BIRD on *Target Phone 5*. BIRD answered and said, "Hey – I'm ... passing ..." GUNTER interrupted and said, "You ain't got nothing else?" BIRD said, "Huh uh – well all I think I got it maybe one ... I might have one – I doubt I even got a whole one." GUNTER said, "I need a half." BIRD said, "Yeah – I think I got that." GUNTER said, "Yeah bring that cause I got to take it to old boy." BIRD said, "Okay – I'm passing Publix now." GUNTER said, "... you know the apartments right behind the Hardee's?" BIRD said he did. GUNTER said, "When you turn in – turn in the first parking lot." (I believe GUNTER wanted to purchase an additional half ounce of cocaine that he was going to sell to someone else. I believe based on other intercepted calls that BIRD was fronting the cocaine to GUNTER. At approximately 7:25 p.m., SA Andrius Knasas observed the Toyota Corolla driven by BIRD turn off Rosewood Drive onto Thornwell Court, which is near GUNTER'S RESIDENCE. SA Jason Greenan observed the Corolla exit Thornwell Court back onto Rosewood Drive a short time later.)
49. On August 18, 2014, at 7:34 p.m., GUNTER used (803) 363-1847 to call BIRD on *Target Phone 5*. GUNTER asked BIRD where BIRD wanted to meet. BIRD said, "I'm going over there to drop the last little thing I got over off ... by that Chinese Restaurant on Farrow Road ..." BIRD went on to tell GUNTER that when he was done with that he

could meet with GUNTER. At 7:46 p.m., GUNTER called BIRD back and they agreed to meet at One Love. At approximately 8:02 p.m., TFO Kevin Loftis and TFO DeJesus observed the grey Toyota Corolla driven by BIRD and the same dark green Chevy Impala at One Love, located at 3922 W. Beltline Boulevard. Both vehicles left the One Love and turned right on W. Beltline Boulevard heading towards Two Notch Road. Agents lost sight of the vehicles. At approximately 8:15 p.m., TFO DeJesus observed the same dark green Chevy Impala, bearing SC license plate JXH-913, parked in front of GUNTER'S RESIDENCE. The Impala is registered to Stephanie Melissa Garrison with a listed address of GUNTER'S RESIDENCE.

50. On August 20, 2014, at 2:12 p.m., [REDACTED] to call BIRD on *Target Phone 5*. During the intercepted call, [REDACTED] said he was ready to see BIRD. BIRD told [REDACTED] it would probably be between 3:30 and 4:00 p.m. [REDACTED] said, "Okay – let everybody know for sure?" BIRD said yes. [REDACTED] said, "... it gonna be three of them now." BIRD agreed. (I believe [REDACTED] wanted to purchase three ounces of cocaine from BIRD.)
51. On August 20, 2014, at 2:57 p.m., JONES used *Target Phone 3* to call BIRD on *Target Phone 5*. BIRD asked JONES if he had something to write with. JONES indicated he had his phone. BIRD said, "Ok – 960 ..." JONES said to hold on and then asked for the area code. BIRD gave the number for *Target Phone 6* and said, "Call Big Boy at that number now." (I believe BIRD was telling JONES to call SMITH on *Target Phone 6*.)
52. On August 20, 2014, at 2:57 p.m., JONES used *Target Phone 2* to call SMITH on *Target Phone 6*. During the intercepted call SMITH asked what was going on and JONES replied, "What's happening big homey?" SMITH said, "You man – uh – man my little girl over there ... on Beltline was talking to me and she say, 'don't you and the dude Fame be ... dealing – well you ain't dealing with him but – you know – you know your people?' - I say, 'Yeah.' She say, 'Cuz a nigga from over that way by Pine Street – talking about the nigga Fame getting his shit from the nigga Big E and Fame taxing it. Talking about they know he getting it for the low-low and then he - the nigga Fame taxing it.' I said, 'huh?' She said, 'Yeah the nigga don't know you but – evidently he know somebody that know the nigga Fame – he was trying to deal with him but say the nigga Fame taxing now – talking about he getting it from the nigga Big E for the low-low – that's where he getting his shit from.' So I say, 'Well damn let me call him and let him know this now.' – cause – you know what I'm saying – I know you ain't running your mouth but niggas trying to be in your business man ..." (I believe SMITH was telling JONES that a female friend of his heard in the street from someone on Pine Street that JONES was being supplied cocaine by SMITH through one of SMITH's associates. I believe SMITH wanted to make sure JONES was not "running his mouth" about the identity of his cocaine supplier. I believe the rumor on the street was that JONES was getting a good price on the cocaine from SMITH and was then "taxing" meaning raising the price to his customers.) JONES determined that the person who spread the rumor had to have been "Diesel" because he was the only person JONES was dealing with from Pine Street. SMITH went on to say he did not "fuck with that nigga" (meaning Diesel). SMITH said, "That's why I told – I told BIRD – I said tell Fame to call me right now so I can let him know this shit right here man ..." SMITH then went on to talk about how

some of his customers had their house broken into and their drugs stolen. One of the customers he referenced was "Ponchie." Later in the conversation SMITH said, "These mother fuckers - see they don't see me no more - I don't be around no more." (I believe SMITH was telling JONES that he no longer deals with his own customers face to face; rather, he has BIRD deal with them.) JONES then addressed the issue of raising the prices and essentially told SMITH that of course he raises the prices because he has to make money. SMITH said, "They already know what time it is - they ain't got no love - ain't nobody god damn doing shit man ... ain't nothing around man - waited and just god damn 13 days just to get something man - my people in mother fucking Miami say it's fucked up and it ain't fixing to get no better any time soon - so if a nigga ain't already got it or he getting it in - he say watch it see how many mother fuckers be screaming - he said ain't nothing be fixing to be coming ... he said Obama got everything locked down since them mother fucking Border Agents got killed last month ... the mother fuckers that killed the Border Agents - they done already got caught three different times coming over here with dope - and they been released every damn time - back to Mexico - now they done killed Border Agents - you know what I'm saying - they say Obama got that shit on lock ... ain't nothing happening right now." JONES said it was crazy. (I believe SMITH was telling JONES he had just gotten his first allotment of cocaine in 13 days. I believe SMITH was telling JONES that his cocaine supplier in Miami had advised they were having trouble getting cocaine into the country right now because President Obama has the borders tightened up and the drug smugglers are having a difficult time.) Later in the call JONES asked if SMITH had talked to "cuz." SMITH said, "Yeah ... he already out and about." JONES said, "Listen - that what I say man ..." SMITH said, "He already out and about - but I told him - right now - no more than two for nobody - because - I told him the only other way is if you already got somebody ready right then and there - that way he can come right back and pick up because I can't sit and wait because it ain't coming like that ... it's a hassle right now - just being real - because I'm doing more riding now than I ..." JONES cut him off and said, "... just tell him ... I'm going to need three cause I already had a deal - my brother wants some." (I believe that SMITH had instructed BIRD to limit the customers to two ounces of cocaine per deal. I believe JONES wanted three ounces because his brother wanted some too.) SMITH later said, "Them boys ain't doing like that no more the (unintelligible) done went up man - it was just now forty and a half on me - they went up to 42 - that's 1500 - what the fuck I'm going to do - when I'm paying 12 now - I got to go to 13 - I been making 150 and two off each but hell - now I ain't even making 150 now - I'm making 125 doing it at 13 - that's why everybody else right now I'm dealing with paying 1350 ... ain't nothing but certain people paying 13 now because hell I'm paying 1200 per now - and like they told me if you want the shit you been getting it's what you're going to pay - if not I can get you something but it ain't going to be what it is ..." (I believe SMITH was telling JONES that his cocaine suppliers raised the price from \$40,500 per kilogram of cocaine to \$42,000 per kilogram of cocaine which has forced SMITH to raise his prices to \$1,300 per ounce.)

53. On August 20, 2014, at 3:52 p.m., *Target Phone 5* received an SMS text message from [REDACTED] that read, "One an a half meet at famliy dallor." (I believe [REDACTED] decided to only purchase 1 1/2 ounces of cocaine from BIRD.)

54. On August 22, 2014, at 8:42 p.m., *Target Phone 5* received an SMS text message from [REDACTED] that read, "This hip need 6an a half oz got 7200 now." (I believe [REDACTED] got a new phone number and was letting BIRD know this was his new number. I also believe [REDACTED] had \$7,200 and wanted to purchase 6 ½ ounces of cocaine from BIRD.)
55. On August 22, 2014, at 9:05 p.m., *Target Phone 5* sent an SMS text message to [REDACTED] that read, "1300 a piece." (I believe BIRD wanted [REDACTED] to know the going price was \$1,300 per ounce, which would be a total of \$8,450 for 6 ½ ounces of cocaine. Additional text messages revealed BIRD wanted to meet the following day.)
56. On August 29, 2014, at 10:00 a.m., SUMTER used *Target Phone 4* to call an unknown male at (803) 363-9128 (hereinafter referred to as UM-9128). UM-9128 told SUMTER that he just saw SUMTER. SUMTER asked what UM-9128 was driving and he responded a Lincoln. SUMTER did not see him and advised he was over by "T.S. Martin." UM-9128 said, "Oh – I'm right here at El Cheapo but I'm fixing to leave this mother fucker – there's too many cars right here." UM-0128 said, "Uh – Mushy had uh tell you what I got going on?" SUMTER said, "No." UM-0128 said, "Oh - I got a god damn 40 for sale." SUMTER said, "Yeah I'm good right now – you know I got a little revolver ..." (I believe UM-0128 was telling SUMTER that he had a .40 caliber pistol for sale. I believe SUMTER was not interested at that time because he already had a revolver.) UM-0128 said, "Oh – okay well shit I'm still trying to scream about a dollar though." SUMTER said, "Alright – shit – uh – come to T.S. Martin – I'm in the back." (I believe UM-0128 wanted to buy \$100 of crack from SUMTER.)
57. On September 1, 2104, at 5:29 p.m., JIT used (803) 206-3184 to call SUMTER on *Target Phone 4*. During the intercepted call, SUMTER said, "... shit I just lay me a nigga yesterday." JIT said, "Yeah." SUMTER said, "Yeah a nigga in SUMTER ... had to have a shootout with that nigga. JIT said, "No." SUMTER said, "Yeah the nigga was strapped bruh." JIT said, "Damn." (I believe SUMTER was telling JIT he robbed a person in SUMTER on the previous day and got into a shootout with the person. I believe SUMTER did not know the guy was "strapped," meaning had a gun on him.) JIT said, "You jugged him though?" SUMTER said, "Yep – I couldn't really get – yeah that nigga had an ass of shit with – I couldn't get really nothing though – you feel me – cause he got to busting." (I believe SUMTER was successful inasmuch as he robbed the person of some drugs; however, he did not get all of the drugs because the guy started shooting at him.) SUMTER said, "But shit I'll make a phone call for you – what you talking about?" JIT said, "Uh shit – probably about ... 21 or something." (I believe JIT wanted to purchase 21 grams of cocaine or crack from SUMTER.)
58. On September 1, 2014, at 9:30 a.m., [REDACTED] to call BIRD on *Target Phone 5*. BIRD answered and said, "Ah – we dead bruh." [REDACTED] said, "It going to be today?" BIRD said, "Um – I don't even know – I ain't even talked to him since ... Friday night – you know it's been the holiday this weekend." [REDACTED] said to let him know. BIRD said the only reason he had the phone on was because "Fame" had left his wallet under the seat of BIRD's car and he was trying to get it back to him. (I

believe BIRD was telling [REDACTED] that he did not have cocaine and he did not know when they would have it because he had not talked to SMITH since Friday.)

59. On September 7, 2014, at 2:20 p.m., *Target Phone 5* received an SMS text message from [REDACTED] that read, "Zone bra." (I know based on training and experience that drug dealers often refer to an ounce as a "zone." I believe [REDACTED] was telling BIRD that he wanted to purchase an ounce of cocaine. BIRD did not respond to the text message.)
60. On September 7, 2014, at 6:20 p.m., [REDACTED] to call BIRD on *Target Phone 5*. BIRD answered and said, "Hey - they going out of town tomorrow." [REDACTED] said, "It will be for sure tomorrow?" BIRD said, "Uh - I don't know - I know they supposed to be going out of town tomorrow." [REDACTED] said, "Oh - okay - so you don't want me to line - you want me to line everybody up and let them know that it might be tomorrow?" BIRD said, "Um - I don't know because he ain't said nothing about it - he just said that ... that they going late tonight or first thing in the morning they jumping on the road." [REDACTED] said, "Okay." BIRD said, "So I don't know if - how far ... or what - you know what I'm saying ..." (I believe BIRD was telling [REDACTED] that SMITH was traveling out of town that night or the following morning to pick up cocaine. I believe [REDACTED] wanted to know if he should start contacting his customers to take cocaine orders for the following day. I believe BIRD was telling [REDACTED] that he was not sure how far SMITH would make it and did not know if he would be back the following day.)
61. On September 12, 2014, at 11:16 a.m., GUNTER used (803) 363-1847 to call SMITH on *Target Phone 6*. During the intercepted call GUNTER started to complain about another person. SMITH told him to hold on. A short time later, SMITH came back to the phone and said, "Yeah - now what you say Tony?" GUNTER went on to say, "Yeah man - I'm fixing to fuck this little punk ass mother fucker up." SMITH started laughing. GUNTER said, "... yeah I say, 'Fame I hit you in your mother fucking mouth nigga ... I help you mother fucker - you wasn't on my mother fucking boy if wasn't for me' - you know what I'm saying?" (I believe GUNTER introduced "Fame" (JONES) to SMITH for the purpose of buying cocaine and that GUNTER was upset with JONES about something to do with the cocaine business.) Later in the call SMITH said, "Um - BIRD um - BIRD will be out today." GUNTER did not hear SMITH. SMITH said, "I said BIRD will be out today ... I had to switch up." GUNTER said, "Yeah - I need some ready you know what I'm saying?" SMITH said, "He say ... he said -um - you had somebody with a problem on the last one." GUNTER said, "Yeah." SMITH said, "I had to switch up." GUNTER went on to say he needed something for himself but did not think he would need more than "a quarter or a half" for himself. SMITH said, "He'll be out later on today - so I will probably see him probably about ... 1:30 - 2:00." GUNTER said, "Yeah you heard what I had said?" SMITH said, "What you say buddy?" GUNTER said, "I probably need something about a quarter or a half cause I be having niggas wanting weight and shit." (I believe SMITH was telling GUNTER he heard someone had a problem with the quality of the cocaine on the last deal. I believe SMITH was telling GUNTER that he has switched the cocaine and had a better quality. I believe GUNTER was telling SMITH he had customers wanting large quantities of cocaine so he

wanted SMITH to front him a quarter kilogram or half kilogram of cocaine.) SMITH said, "Um – let me wait until after he gets this right here and gets this off first – you know what I'm saying – because I had to – like I said I had to switch out ... but it ain't no problem." (I believe SMITH was telling GUNTER he wanted BIRD to sell the first batch of cocaine before he was willing to front a quarter or half kilogram of cocaine to GUNTER because SMITH wanted to make sure the quality was good.)

62. On September 12, 2014, at 11:36 p.m., SMITH used *Target Phone 6* to call BIRD at (803) 200-5909. BIRD asked what was up. SMITH said, "Hey ... have everything ready for you god damn – probably about the time them boys start getting out of school – about 3:00 – 3:30." BIRD said, "Okay – that sounds good." SMITH said, "Shit – I just got back from damn Florence just now." BIRD said, "I said if I didn't hear nothing from you today I was going to ride down there later on today just to check ..." SMITH said, "No man – cause Whop's cousin had snatched a damn nine piece this morning and them boys ... from Florence snatched a half ... so hell – I made – what – 11-7 and 23 – shit that's what 35 I done already made today." (I believe SMITH was telling BIRD he would be ready for BIRD to come to SMITH'S RESIDENCE to pick up the cocaine. I believe SMITH was bragging to BIRD that he had already sold nine ounces of cocaine for \$11,700 and a half kilogram of cocaine for \$23,000, for a total of \$35,000 in cocaine sales that morning.) SMITH said, "I got you together – soon as I get back down that way – I'll just call you and tell you to come on." (I believe SMITH was telling BIRD he had the cocaine ready and when he got to SMITH'S RESIDENCE he would call BIRD and tell him to come there.)
63. On September 12, 2014, at 3:20 p.m., SMITH used *Target Phone 6* to call BIRD at (803) 200-5909. SMITH said, "You can come on cuz." (I believe SMITH was telling BIRD to come to SMITH'S RESIDENCE to pick up the cocaine. Cell tower data for this call shows that *Target Phone 6* was in the vicinity of SMITH'S RESIDENCE.)
64. On September 13, 2014, at 2:47 p.m., BIRD used *Target Phone 5* to call GUNTER at (803) 363-1847. GUNTER answered and BIRD said, "Hey I'm here ... I'm outside." (According to cell tower data, *Target Phone 5* was in the vicinity of GUNTER'S RESIDENCE. As further detailed below, I believe BIRD was delivering cocaine to GUNTER.)
65. On September 13, 2014, at 2:59 p.m., GUNTER used (803) 363-1847 to call BIRD on *Target Phone 5*. GUNTER said, "Hey man come on back and get this shit – cause I ain't got time for this other nigga shit cause they thinking it's got cut on it cause it's in shake – come on back and get this ..." BIRD said, "Just hold on to it and I'll get it from you in a little while." GUNTER agreed. (I believe GUNTER was telling BIRD that his customer was complaining about the quality of the cocaine. I believe BIRD was telling GUNTER he would come back later and pick up the cocaine. I believe based on additional calls, as detailed herein, that BIRD later returned the bad cocaine to SMITH at SMITH'S RESIDENCE.)
66. On September 14, 2014, at 1:14 a.m., Justin LNU (Last Name Unknown) used (803) 260-7608 to call SUMTER on *Target Phone 7*. During the intercepted call, SUMTER said,

“You still got that MAC?” Justin said he did. SUMTER said, “I want to buy that shit tomorrow.” Justin told SUMTER he could buy it for three-five, meaning \$350. SUMTER agreed. (I believe SUMTER was trying to purchase a MAC-10 or MAC-11 assault style pistol from Justin for \$350. Additional calls as detailed herein revealed that SUMTER’s girlfriend, Ferial Williams, purchased the gun for SUMTER for \$300 from Justin on September 16, 2014.)

67. On September 14, 2014, at 7:07 p.m., BIRD used (803) 200-5909 to call SMITH on *Target Phone 6*. BIRD asked if SMITH was home. SMITH said, “No ... I’m up here in the city.” BIRD said, “You in the city?” SMITH said, “Yeah.” BIRD said, “Whenever you get ready to go back up the road – um – just call me cause I need you to take something back up there with you.” SMITH agreed. (I believe BIRD was telling SMITH to let him know before he gets on the road to meet the cocaine supplier because they need to return the bad cocaine from GUNTER.)
68. On September 15, 2014, at 2:31 p.m., BIRD used (803) 200-5909 to call SMITH on *Target Phone 6*. SMITH answered and BIRD said, “Hey you home?” SMITH said he was not home and further advised he was in Florence. BIRD said, “Okay – whenever you get back just let me know.” (This was the first telephonic contact between SMITH and BIRD since the previous call detailed herein. I believe BIRD was still trying to meet with SMITH at SMITH’S RESIDENCE to return the bad cocaine.)
69. On September 15, 2014, at 8:03 p.m., SMITH used *Target Phone 6* to call BIRD on (803) 200-5909. SMITH said, “Hey I just got back to the house.” BIRD said, “Okay.” (I believe SMITH was notifying BIRD he was at SMITH’S RESIDENCE and he was ready for BIRD to bring the bad cocaine to him.) At approximately 9:11 p.m., SA Jason Greenan observed a black Dodge Avenger, bearing SC tag KFG272, known to be driven by BIRD, on Mack Street heading towards Meadowfield Road. The Dodge Avenger is also a rental car owned by Godwin Towing and Rentals. At approximately 9:15 p.m., TFO DeJesus observed the Avenger pull into the driveway of SMITH’S RESIDENCE.
70. On September 16, 2014, at 4:26 p.m., a female, Big T (TNU) used (843) 253-2633 to call SMITH on *Target Phone 6*. The phone call was over 17 minutes in duration. (I know from intercepted calls over *Target Phone 5*, that BIRD supplies Big T with cocaine.) During the intercepted call, SMITH and Big T discussed how a South Carolina Highway Patrolman recently shot an unarmed man. Big T said, “Man that shit getting nationwide dog.” SMITH said, “That’s why I keep my pistol with me – mother fucker – if I’m going to go – we’ll both go together – that’s the way I see it – cause I ain’t really god damn – hell you shoot me and then I’m the one god damn mother fucking got to have my family sad thinking – we’ll both be sad thinking mother fucker.” (I believe SMITH was telling Big T that he keeps his pistol on him and he would be willing to shoot any police officer who may pose a threat to him. I believe SMITH was saying his family would be in mourning if he was shot and therefore the police officer’s family should be too.)
71. On September 16, 2014, SMITH used *Target Phone 6* to call Abel Jacobs to coordinate taking 30 to 35 dogs to get shots near Zesto’s in West Columbia. From approximately 3:35 p.m. to 4:12 p.m., I conducted surveillance at Pet-Vac Animal Hospital located at

308 Charleston Highway, West Columbia, SC. I observed a blue in color 2002 GMC Sierra pickup truck in the parking lot that was bearing SC tag 124-4GR, registered to Khalilah Shunta Smith, 627 Boy Scout Road, Gaston, SC. I observed SMITH meet with a person driving another pickup truck owned by Abel Jacobs. Both SMITH and the other person took numerous Pit Bull dogs from both trucks into the business and then brought the dogs back out to the trucks. Additional intercepted calls revealed that SMITH had been ticketed by Lexington County Animal Control for not having rabies shots for the more than 30 dogs he keeps at SMITH'S RESIDENCE.

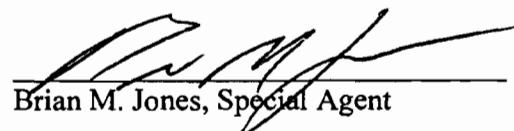
72. On September 16, 2014, at 5:56 p.m., SMITH used *Target Phone 6* to call an unknown male at (706) 836-7691 (hereinafter UM-9691). The call duration was over 24 minutes. The entire call was about dogs and dog fighting. During the intercepted call, SMITH said, "... like I told him – you want some bull dogs you got to travel out of state mother fucker – there ain't no bull dogs around here right now – if you want them you got to go get them – plain and simple – you got to pay for what you want – if you see them around here still breeding that same shit that been quitting on you for the past five and ten years then that is exactly what I want you there in the box with – cause I'm going to take your money – keep on breeding that shit that been starving for five or ten years – I want your money – come to the box – come on to the box ..." (I believe SMITH was talking about how fighting dogs in South Carolina were not as good as dogs bred outside of the state. I believe SMITH was saying he was happy to put one of his dogs up against a local dog in an organized dog fight because his dog would win, making SMITH a lot of money.) Later in the call SMITH said, "You can't be real with everybody man – I learned the hard way ... trying to be alright and trying to be who I am – who I always been – and not changing myself – but you niggas made me change man – and they know I ain't playing no games man ... I got a family man – I ain't time to play these games – you cross me I'm going to kill you ..." (I believe SMITH was telling UM-9691 that if anyone crossed him that he would kill them.) SMITH went on ranting about guys in Columbia and how he had been carrying all the people in Columbia. SMITH later discussed how he offered to sell "Los" a dog that was "box ready" for \$2,000. SMITH clarified he was not selling his dogs but if Los wanted one from him it was going to cost him \$2,000 because all of his dogs were of age and "have their stripes behind them." UM-9691 said, "I wouldn't even tell nobody like that bruh ..." UM-9691 warned SMITH to be more vague talking about the dogs and specifically warned him not to use the term "box ready." (I believe SMITH was telling UM-9691 he was willing to sell a dog that was ready to fight for \$2,000 and UM-9691 was warning him to not openly talk about it to other people he did not know well.) Later in the call, SMITH said, "Man he been trying to get a dog from me for a minute – like I told him – he wants one that's ready – it's going to be \$2,000 plain and simple – ain't nothing cheap – cause he tried to buy a female from me last year and I told him \$1,500 and he said, 'man let me give you a 1000 for her and then you know after I do' – I said like hell if it's like that I'll do it myself – so we took the bitch and did it for five and won with her in 39 minutes – with a kill..." (I believe SMITH was telling UM-9691 that Los wanted to buy a female dog last year for \$1,000 but SMITH wanted \$1,500. I believe SMITH was saying he bet \$500 on the dog during an organized dog fight and the dog killed her opponent in 39 minutes.)

73. On September 18, 2014, at 2:01 p.m., SMITH used *Target Phone 6* to call an unknown male at (304) 237-4503 (hereinafter referred to as UM-4503). The duration of the call was over seven minutes. During the intercepted call UM-4503 said, "Man I got both them males in – them mother fuckers ... I seen videos – I got the video for one of them – you know what I'm saying – and they good dogs man – but these nigga's – I didn't really want to talk on the phone about what I want to tell you about – but shit – when I get there ... everything on the other end might be way better than the little drive you taking." (In earlier calls, UM-4503 told SMITH he was in Mexico and was able to buy a good dog for SMITH. SMITH had told UM-4503 that he had been in Miami and I believe based on the context of the calls that SMITH was alluding to UM-4503 that he was buying cocaine in Miami. I believe UM-4503 was telling SMITH in this call that he had a video of one of the dog's in an organized dog fight. I further believe UM-4503 was telling SMITH he had made a contact with another cocaine supplier that SMITH could deal with instead of traveling to Miami.) SMITH said, "Shit that's lovely." SMITH went on to say, "Hell – I do about three or four a week so if you can keep me with it – that's lovely." UM-4503 said, "I seen it with my eyes." SMITH said, "Yeah - I don't move major shit but I move about three or four a week – I do a 100 – 150 a week ... that's more money than ... a whole lot of niggas god damn bringing in right now." (I believe SMITH was telling UM-4503 that he did not move major weight in cocaine but he moved three to four kilograms per week and was spending between \$100,000 and \$150,000 per week.)

CONCLUSION

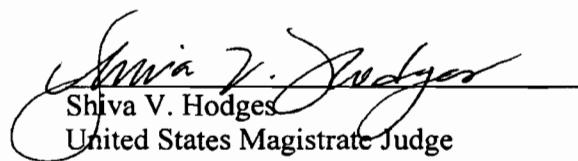
74. Based on the above facts and circumstances, I believe there is probable cause to issue arrest warrants for SMITH, BIRD, JONES, SUMTER, GUNTER, ████████ DION, and JIT for violations of Title 21, United States Code, Sections 841, 843(b) and 846.

This affidavit has been reviewed by AUSA Jane Taylor.



Brian M. Jones, Special Agent

Sworn to and subscribed before me
This 30th day of September 2014



Shiva V. Hodges
United States Magistrate Judge